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September 15, 2008

HAND-DELIVERED

Ms. Candrea Allen
Utilities Division
ARIZONA CORPORATION COMMISSION
1200 West Washington
Phoenix, Arizona 85007

Arizona Corporation Commission
DOCKETED

SEP 15 2008

DOCKETED BY	
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Re: Peerless Network of Arizona, LLC (Docket No. T-20590A-08-0175)
Response to Staff's Second Set of Data Requests and Revised Exhibit to Staff
Data Request CA-1

Dear Candrea:

On September 3, 2008, the Arizona Corporation Commission's Utilities Division ("Staff") issued a letter of insufficiency and second set of data requests in the above-referenced matter. The letter identified additional information that Staff needs to complete its analysis of Peerless Network of Arizona, LLC's ("Applicant") application for a Competitive Certificate of Convenience and Necessity. Enclosed are Applicant's responses to Staff's Second Set of Data Requests CA-2.1 through CA-2.3.

Additionally, since the filing of Applicant's response to Staff Data Request CA-1, several additional new affiliates have been formed and the information provided in Exhibit CA-1 has changed. Accordingly, Applicant is providing a revised and updated Exhibit CA-1. Please note that the enclosed responses are not impacted by the revised and updated Exhibit CA-1.

If you have any questions regarding this submittal, please contact me at the direct line listed above.

Very truly yours,

SNELL & WILMER

Jeffrey W. Crockett

JWC:gdb/enclosures

cc: Docket Control (original plus 13 copies)

**RESPONSES TO STAFF'S SECOND SET OF DATA REQUESTS FOR
PEERLESS NETWORK OF ARIZONA, LLC
DOCKET NO. T-20590A-08-0175**

CA-2.1 Please specify the current position held, at Peerless, by each individual listed in Appendix B of the application.

Response:

The current positions of the individuals identified in Appendix B of the Application are as follows:

John Barnicle - President and Chief Executive Officer

Douglass B. Lee - Executive Vice President and Chief Financial Officer

Richard Knight - Executive Vice President, Sales and Marketing

Prepared by:

Daniel Meldazis
Director of Regulatory Affairs
Peerless Network of Arizona, LLC
225 West Washington Street, Suite 1285
Chicago, Illinois 60606

CA-2.2 Do any of the individuals identified in Appendix B of the application currently hold or have any of the individuals ever held a position at any of the Peerless' ten (10) other affiliates or at Peerless Networks, LLC?

Response:

Yes. See the response to Staff Data Request CA-2.3 below.

Prepared by:

Daniel Meldazis
Director of Regulatory Affairs
Peerless Network of Arizona, LLC
225 West Washington Street, Suite 1285
Chicago, Illinois 60606

**RESPONSES TO STAFF'S SECOND SET OF DATA REQUESTS FOR
PEERLESS NETWORK OF ARIZONA, LLC
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CA-2.3 **If the answer to CA-2.2 is in the affirmative, please provide the following information:**

- a. The individual's name;
- b. The name of the affiliate, including Peerless Networks, LLC, that the individual is currently an employee of;
- c. The current and/or previous position held by that individual at the affiliate or Peerless Networks, LLC.

Response:

- a. John Barnicle, Douglass B. Lee and Richard Knight.
- b. The three individuals identified in the response to Staff Data Request CA-2.3(a) above are employed by Peerless Networks, LLC.
- c. The three individuals identified in the response to Staff Data Request CA-2.3(a) above hold the same titles and positions with each affiliate of Peerless Network of Arizona, LLC. Their titles and positions have not changed since the inception of the various affiliates.

Prepared by:

Daniel Meldazis
Director of Regulatory Affairs
Peerless Network of Arizona, LLC
225 West Washington Street, Suite 1285
Chicago, Illinois 60606

REVISED CA-1

Subsidiary	Local Service Authority?	Providing Service?
Peerless Network of Arizona, LLC	No	No
Peerless Network of California, LLC	No	No
Peerless Network of Colorado, LLC	Yes	No
Peerless Network of Connecticut, LLC	No	No
Peerless Network of Delaware, LLC	No	No
Peerless Network of the District of Columbia LLC	No	No
Peerless Network of Florida, LLC	Yes	No
Peerless Network of Georgia, LLC	Yes	No
Peerless Network of Illinois, LLC	Yes	Yes
Peerless Network of Indiana, LLC	Yes	No
Peerless Network of Maryland, LLC	No	No
Peerless Network of Massachusetts, LLC	Yes	No
Peerless Network of Minnesota, LLC	Yes	No
Peerless Network of Missouri, LLC	Yes	No
Peerless Network of Nevada, LLC	No	No
Peerless Network of New Jersey, LLC	Yes	No
Peerless Network of New York, LLC	Yes	Yes
Peerless Network of North Carolina, LLC	No	No
Peerless Network of Ohio, LLC	Yes	No
Peerless Network of Oregon, LLC	Yes	No
Peerless Network of Pennsylvania, LLC	Yes	Yes

Peerless Network of Tennessee, LLC	Yes	No
Peerless Network of Texas, LLC	Yes	No
Peerless Network of Virginia, LLC	No	No
Peerless Network of Washington, LLC	Yes	No
Peerless Network of Wisconsin, LLC	Yes	No